

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS HARAHUSH TO INTERROGATORY OF  
ADVO, INC.  
(ADVO/USPS-ST49-1)

The United States Postal Service hereby provides the response of witness Harahush to the following interrogatory of Advo, Inc.: ADVO/USPS-ST49-1, filed on November 14, 1997.

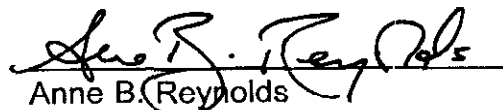
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anne B. Reynolds

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2970; Fax -5402  
November 21, 1997

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS HARAHUSH  
TO INTERROGATORIES OF ADVO, INC.

ADVO/USPS-ST-49-1. Please confirm the following. If you cannot, please explain fully what the values used in the base year workpapers do represent.

- (a) The number of actual stops, possible stops, and pieces by shape and delivery characteristic (accountability, collections), route type and stop type generated from the City Carrier System and used in the USPS base year workpapers (USPS-T-5, WP B-7) are total FY96 values for the USPS system.
- (b) The Rural Carrier System number of pieces by the various characteristics and subclasses identified and used as distribution keys in the USPS base year workpapers (USPS-T-5, WP B-7) are total FY96 values for the USPS system.

RESPONSE:

- (a) This information is available in Library Reference H-32, City Carrier

Distribution Key Development Source Code and Program Outputs.

- (b) This information is available in Library Reference H-33, Rural Carrier

Distribution Key Development Source Code and Program Outputs.

# DECLARATION

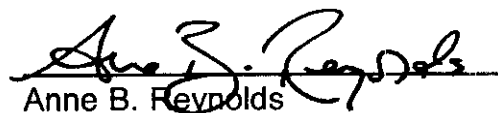
I, Thomas W. Harahush, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Thomas W. Harahush

Dated: 11-21-97

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Anne B. Reynolds

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Washington, D.C. 20260-1137  
November 21, 1997